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13 Counsel for Plaintiffs

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16

17 GOPI VEDACHALAM and KANGANA  
BERI, on behalf of themselves and all  
18 others similarly situated,

19 Plaintiffs,

20 v.

21 TATA AMERICA INTERNATIONAL  
CORPORATION, a New York  
22 Corporation; TATA CONSULTANCY  
SERVICES, LTD, an Indian Corporation;  
23 and TATA SONS, LTD, an Indian  
Corporation,

24 Defendants.

CASE NO. C 06-0963 (CV)

**STIPULATION AND ORDER RE: CLASS  
CERTIFICATION MOTION DEADLINES**

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1           **WHEREAS**, by Order of January 14, 2011, the current class certification motion briefing  
 2 schedule is as follows: Plaintiffs' Motion for Class Certification is currently set for hearing on  
 3 April 14, 2011 at 2:00 p.m.; Plaintiffs' Opening Brief in Support of Motion for Class Certification  
 4 is currently due to be filed by February 3, 2011; Defendants' Opposition Brief is currently due to  
 5 be filed by March 10, 2011; and Plaintiffs' reply brief is due to be filed by March 31, 2011;

6           **WHEREAS**, Plaintiffs filed a motion to compel production of certain documents sought  
 7 in discovery, arguing that they are directly relevant to the class certification issue, which  
 8 Defendants opposed on several grounds;

9           **WHEREAS**, on January 28, 2011, the Honorable Elizabeth D. Laporte, Magistrate Judge,  
 10 held a hearing on Plaintiffs' motion, at which she adopted and so ordered, as more fully stated on  
 11 the record, the parties' stipulated agreement that Defendants would produce the requested  
 12 documents to Plaintiffs no later than 60 days from the hearing date, noting that the parties would  
 13 submit to the Court a joint stipulation and proposed order that would request a change to the  
 14 briefing schedule for the class certification motion to allow the discovery to be produced to  
 15 Plaintiffs in time for them to consider and use the discovery as part of their class certification  
 16 motion, subject to the Court's calendar;

17           **WHEREAS**, subject to the Court's approval, the parties agreed that this Stipulation and  
 18 Order re: Class Certification Motion Deadlines would not alter the briefing schedule and hearing  
 19 date on Defendants' motion for partial summary judgment set forth in the Court's Order, entered  
 20 on January 14, 2011;

21           **THE PARTIES HEREBY AGREE AND STIPULATE AS FOLLOWS:**

- 22           1. Plaintiffs' Motion for Class Certification, currently set for hearing on April 14, 2011 at  
 23 2:00 p.m., is re-set for hearing on July 7, 2011 (or on a date thereafter convenient to the  
 24 Court);
- 25           2. Plaintiffs' Opening Brief in Support of the Motion for Class Certification shall be served  
 26 and filed on or before April 25, 2011;
- 27           3. Defendants' Opposition Brief shall be served and filed on or before June 3, 2011; and  
 28

4. Plaintiffs' Reply Brief shall be served and filed on or before June 23, 2011.

**IT IS SO STIPULATED.**

Dated: January 31, 2011

Respectfully submitted,

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

By: /s/ Kelly M. Dermody  
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Dated: January 31, 2011

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10 *INTERNATIONAL CORPORATION, TATA*

11 *CONSULTANCY SERVICES, LTD., and TATA SONS,*  
12 *LTD.*

13 **ORDER**

14 Based on the preceding stipulation, this Court hereby orders that the class certification  
15 motion briefing shall proceed and the hearing shall be set as follows:

16 Plaintiffs' Motion for Class Certification, currently set for hearing on April 14, 2011 at  
17 2:00 p.m., is re-set for hearing on July 14, 2011;

18 **Case Management Conference, currently set for April 14, 2011 at 2:00 p.m., is reset**  
19 **to July 14, 2011;**

20 Plaintiffs' Opening Brief in Support of the Motion for Class Certification shall be served  
21 and filed on or before April 25, 2011;

22 Defendants' Opposition Brief shall be served and filed on or before June 3, 2011; and

23 Plaintiffs' Reply Brief shall be served and filed on or before June 23, 2011.

24  
25 Dated: 2/2/2011

26   
27 HONORABLE CLAUDIA WILKEN  
28 United States District Court Judge